



no effect on any other deadlines currently established in this case and will not prejudice Plaintiff in any respect.

The basis for the Dorchester Defendants' motion is that the undersigned primary attorneys – Mr. Buyck and Mr. Smythe – are currently in trial this week in another civil matter in Beaufort County. The week prior, during which time Plaintiff's Response in Opposition was filed, undersigned defense counsel were preparing for trial, meeting with witnesses, attending depositions, and appearing for multiple virtual and telephonic conferences with the trial judge and court personnel. This trial is expected to last the rest of this week. It is anticipated that extending these Defendants' current Reply deadline by an additional seven (7) days would allow for adequate time to review Plaintiff's lengthy memorandum in opposition and prepare and file Defendants' Reply.

Given the above, the undersigned counsel for the Dorchester Defendants respectfully requests extension of the deadline to file a Reply, if any, to Plaintiffs' Response in Opposition to December 13, 2022. Prior to filing this request for additional time, the undersigned telephoned Plaintiff's counsel to discuss the same and request consent, but as of this filing, have not heard back.

[signature page and Certificate of Service follow]

Respectfully submitted,

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s/ Jeffrey H. Lappin

Hugh W. Buyck (Fed. ID # 6099)

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Attorneys for Dorchester Defendants Knight,  
Dixon, Thompson and Krutak

December 6, 2022

Mt. Pleasant, South Carolina

**CERTIFICATE OF SERVICE**

I certify that on this date a copy of the foregoing was served on each party or counsel of record by ☒ via electronic filing, ☒ mailing, ☐ e-mailing, ☐ facsimile, or ☐ hand delivery in the manner prescribed by the applicable Rule of Civil Procedure.

This 6<sup>th</sup> day of December, 2022.

s/ Jeffrey H. Lappin